

Christine Y. Wong, Bar No. 284026  
ChristineWong@mofo.com  
Morrison & Foerster LLP  
425 Market Street  
San Francisco, California 94105-2482  
Telephone: 415.268.7000  
Facsimile: 415.268.7522  
Attorney for Gary Szukalski

Ted W. Cassman, Bar No. 98932  
Raphael M. Goldman, Bar No. 229261  
goldman@achlaw.com  
cassman@achlaw.com  
Arguedas, Cassman, Headley & Goldman LLP  
803 Hearst Avenue  
Berkeley, CA 94710  
Telephone: (510) 845-3000  
Facsimile: (510) 845-3003  
Attorneys for Nicole Eagan

Thomas H. Bienert, Jr., Bar No. 135311  
Sandra Lechman, Bar No. 288660  
tbienert@bklwlaw.com  
slechman@bklwlaw.com  
Bienert Katzman Littrell Williams LLP  
CalEdison Building  
601 W. 5th Street, Suite 720  
Los Angeles, CA 90071  
Telephone: (213) 528-3400  
Facsimile: (949) 369-3701

Stephen Binhak (pro hac vice application imminent)  
binhaks@binhaklaw.com  
The Law Office of Stephen James Binhak, P.L.L.C.  
One Southeast Third Ave., Suite 2600  
Miami, Florida 33131  
Telephone: (305) 361-5500  
Facsimile: (305) 428-9532  
Attorneys for Rob Sass

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL RICHARD LYNCH and  
STEPHEN KEITH CHAMBERLAIN,

Defendants.

Case No. 3:18-cr-577-CRB

**STIPULATION FOR EXTENSION OF  
TIME TO RESPOND TO RULE 17  
SUBPOENAS**

STIPULATION FOR EXTENSION OF TIME TO RESPOND TO  
RULE 17 SUBPOENAS Case No. 3:18-cr-577-CRB

1 Pursuant to Federal Rule of Criminal Procedure 45(b), Gary Szukalski, Rob Sass, and  
2 Nicole Eagan respectfully submit this stipulation for a sixty (60) day extension of time in which  
3 to produce documents requested by counsel for the United States in the above captioned matter.

4 On June 8, 2022, this Court issued Rule 17 Subpoenas to Testify and Produce Documents  
5 or Objects in a Criminal Case (the “Subpoenas”) to each of Gary Szukalski, Rob Sass, and Nicole  
6 Eagan (the “Subpoena Recipients”). The deadline to provide responsive documents is currently  
7 October 5, 2022. If the Court grants this stipulation, the response will instead be due Monday,  
8 December 5, 2022.

9 Counsel for the Subpoena Recipients informed counsel for the United States of their  
10 intention to seek this extension. The United States does not oppose and joins in this stipulation.  
11 The Subpoena Recipients have not made any prior requests for an extension of this deadline. In  
12 support of this stipulation, the Subpoena Recipients state the following:

13 1. There is good cause to grant this stipulation. While reserving all rights regarding  
14 objections to the subpoena, the Subpoena Recipients are engaged in discussions with the United  
15 States regarding the scope of documents sought by the Subpoenas.

16 2. In the interest of judicial efficiency and to allow time for these discussions to continue,  
17 the Subpoena Recipients request that this Court allow a 60-day extension of time in which to  
18 produce documents.

19 3. The United States has consented to the requested extension and would not be  
20 prejudiced if it were granted. Moreover, given that this matter is not yet set for trial, the  
21 extension sought will not delay the Court’s proceedings.

22 5. For the foregoing reasons, the Subpoena Recipients respectfully request that, in  
23 accordance with this stipulation, the time in which they may produce documents responsive to the  
24 Subpoenas be extended by sixty days, to and including December 5, 2022.

1 Dated: October 3, 2022

MORRISON & FOERSTER LLP

2  
3 By: /s/ Christine Y. Wong  
4 Christine Y. Wong

5 Attorney for Gary Szukalski

6 Dated: October 3, 2022

7  
8 By: /s/ Ted W. Cassman  
9 Ted W. Cassman

10 Attorney for Nicole Eagan

11 Dated: October 3, 2022

12 By: /s/ Thomas H. Bienert, Jr.  
13 Thomas H. Bienert, Jr.

14 Local Counsel for Rob Sass (Stephen James  
15 Binhak Pro Hac Vice Motion Imminent)

16 Dated: October 3, 2022

17 By: /s/ Adam A. Reeves  
18 Adam A. Reeves

19 Assistant United States Attorney  
20  
21  
22  
23  
24  
25  
26  
27  
28